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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,
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11 Plaintiff,
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13 vs.
14 EMERALD RUTH WILSON-BEY,
15 Defendant.

CASE NO: 2:21-cr-00306-GMN-NJK

STIPULATION AND ORDER TO
CONTINUE CHANGE OF PLEA
HEARING

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson
19 United States Attorney, through Jim. W. Fang, Assistant United States Attorney, counsel for the
20 United States of America, and Jennifer M. Waldo counsel for Emerald Ruth Wilson-Bey that the
21 Change of Plea hearing, currently scheduled for Tuesday, January 17, 2023 be vacated and
22 advanced to Tuesday, January 3, 2023 at 2:00 p.m.

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STIPULATION AND ORDER TO CONTINUE CHANGE OF PLEA HEARING - 1

The Stipulation is entered into for the following reasons:

1. That the parties resolved this matter through pretrial plea negotiations and have submitted a fully-executed plea agreement to the Court for its consideration;
2. On November 2, 2022, an expedited change of plea hearing was set for December 6, 2022 at 11:00 a.m.;
3. That based upon the stipulation of parties (ECF No.: 117), the change of plea hearing was moved up to November 29, 2022;
4. That on November 28, 2022, the parties filed another stipulation (ECF No.: 118) to continue the change of plea hearing to allow defense counsel additional time to speak with Ms. Wilson-Bey regarding the negotiations;
5. That Ms. Wilson-Bey and her counsel have since spoken regarding the plea negotiations and she is ready to move forward with the current deal;
6. That counsel for Ms. Wilson-Bey has spoken to government counsel and the government has no objection to advancing the change of plea hearing; and
7. This is the second request to advance the change of plea hearing.

DATED this 20th day of December, 2022.

JASON M. FRIERSON
United States Attorney

/s/ Jim W. Fang

Counsel for USA

WALDO LAW, LLC.

/s/ Jennifer M. Waldo

Counsel for Emerald Wilson-Bey

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**STIPULATION AND ORDER TO
CONTINUE CHANGE OF PLEA
HEARING**

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19 **FINDINGS OF FACT**

- 20 1. That the parties resolved this matter through pretrial plea negotiations and have
21 submitted a fully-executed plea agreement to the Court for its consideration;
- 22 2. On November 2, 2022, an expedited change of plea hearing was set for December
23 6, 2022 at 11:00 a.m.;
- 24 3. That based upon the stipulation of parties (ECF No.: 117), the change of plea
25 hearing was moved up to November 29, 2022;
- 26 4. That on November 28, 2022, the parties filed another stipulation (ECF No.: 118)
to continue the change of plea hearing to allow defense counsel additional time to
speak with Ms. Wilson-Bey regarding the negotiations;

5. That Ms. Wilson-Bey and her counsel have since spoken regarding the plea negotiations and she is ready to move forward with the current deal;
6. That counsel for Ms. Wilson-Bey has spoken to government counsel and the government has no objection to advancing the change of plea hearing; and
7. This is the second request to advance the change of plea hearing.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interests of the public and the defense in a proceeding with the change of plea hearing as currently scheduled.

ORDER

IT IS THEREFORE ORDERED that the change of plea hearing currently scheduled for January 17, 2023 at 11:00 a.m., be vacated and advanced to the 3rd day of January, 2023, at the hour of 2:00 pm.

DATED AND DONE this 20 day of December, 2022.


UNITED STATES DISTRICT JUDGE